

**UNITED STATES OF AMERICA  
DEPARTMENT OF THE TREASURY  
COMPTROLLER OF THE CURRENCY**

\_\_\_\_\_  
**In the Matter of:** )  
The Summit National Bank )  
Atlanta, Georgia )

**CONSENT ORDER**

The Comptroller of the Currency of the United States of America (“Comptroller”), through his National Bank Examiner, has supervisory authority over The Summit National Bank, Atlanta, Georgia (“Bank”), and has concluded that the Bank has violated provisions of 31 C.F.R. § 5318, 12 C.F.R. Part 21, and 31 C.F.R. Part 103.

The Bank, by and through its duly elected and acting Board of Directors (“Board”), has executed a “Stipulation and Consent to the Issuance of a Consent Order,” dated \_\_\_\_\_, that is accepted by the Comptroller. By this Stipulation and Consent, which is incorporated by reference, the Bank has consented to the issuance of this Consent Order (“Order”) by the Comptroller.

Pursuant to the authority vested in it by the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818, the Comptroller hereby orders that:

**ARTICLE I**

**COMPLIANCE COMMITTEE**

(1) Within thirty (30) days of the date of this Order, the Board shall appoint a Compliance Committee of at least three (3) directors, of which no more than one (1) shall be an employee or principal shareholder (as the term “principal shareholder” is defined in 12 C.F.R. § 215.2(m)) of the Bank or any of its affiliates (as the term “affiliate” is defined in 12 U.S.C.

§ 371c(b)(1)), or a family member of any such person. Bank directors already serving on the audit committee of the Board may also serve as members of the Compliance Committee, so long as doing so would be consistent with the foregoing limitations. Upon appointment, the names of the members of the Compliance Committee (and, in the event of a change of the membership, the name of any new member) shall be submitted in writing to the Assistant Deputy Comptroller, Georgia Field Office, 117 Perimeter Center West, Suite 401, Atlanta, GA 30338-5447. The Compliance Committee shall be responsible for monitoring and coordinating the Bank's adherence to the provisions of this Order.

(2) The Compliance Committee shall meet at least monthly.

(3) Within forty-five (45) days of the date of this Order and quarterly thereafter, the Compliance Committee shall submit a written progress report to the Board setting forth in detail:

(a) a description of the action needed to achieve full compliance with each Article of this Order;

(b) actions taken to comply with each Article of this Order; and

(c) the results and status of those actions.

(4) The Board shall forward a copy of each report submitted by the Compliance Committee, with any additional comments by the Board, to the Assistant Deputy Comptroller within ten (10) days of receiving such report.

(5) Creation of the Compliance Committee does not relieve the full Board of its responsibility to ensure full compliance with this Order.

## ARTICLE II

### BANK SECRECY ACT INTERNAL CONTROLS

(1) Within sixty (60) days of the date of this Order, the Board shall develop, implement, and thereafter ensure Bank adherence to a written program of policies and procedures to provide for compliance with the Bank Secrecy Act (31 U.S.C. § 5311 *et seq.*); the regulations promulgated at 31 C.F.R. Part 103, as amended, and at 12 C.F.R. Part 21, Subparts B and C; and the rules and regulations of the Office of Foreign Assets Control (“OFAC”) (collectively referred to herein as the “Bank Secrecy Act” or “BSA”). At a minimum, this program shall include the following:

- (a) an ongoing and comprehensive process to assess, identify, and assign risk levels to customers, products, services, and geographies, consistent with the Quantity of Risk Matrix included as Appendix J to the Bank Secrecy Act Anti-Money Laundering Examination Manual (“Manual”), and to evaluate the quality of BSA risk management in each line of business and functional area (“LOB”);
- (b) implementation of suspicious activity monitoring controls for all LOB’s, including controls in each LOB that are commensurate with the level of risk identified in that LOB to ensure suspicious activity monitoring in all LOB’s;
- (c) a governance structure, with clear lines of responsibility beginning with senior management and including each LOB, in which accountability for BSA compliance is clearly communicated and enforced;

- (d) enhanced policies and procedures for recording, maintaining, and recalling information about transactions that pose greater than normal risk for compliance with the Bank Secrecy Act;
- (e) well-defined policies and procedures for investigating and resolving the Bank's response to transactions that the Bank identifies as unusual or suspicious;
- (f) adequate controls and procedures to ensure that all suspicious and large currency transactions are identified and accurately reported in a timely manner;
- (g) procedures to maintain records on monetary instrument transactions and funds transfers, as required by the BSA;
- (h) comprehensive procedures to identify and report to appropriate management personnel:
  - (i) frequent or large volume cash deposits or wire transfers or book entry transfers to or from offshore or domestic entities or individuals;
  - (ii) wire transfers or book entry transfers that are deposited into several accounts;
  - (iii) receipt and disbursement of wire transfers or book entry transfers without an apparent *bona fide* business reason;
  - (iv) receipt and disbursement of wire transfers or book entry transfers that are suspicious or inconsistent with the customers' business;

- (v) receipt and disbursement of currency or monetary instruments that are suspicious or inconsistent with the customers' business; and
- (vi) accounts opened in the name of or for the benefit of a "financial institution" as defined in 31 C.F.R. § 103.11(n) or "foreign bank," as defined in 31 C.F.R. § 103.11(o);
- (i) a method for introducing new products and services that ensures that the policies and procedures governing new products and services are consistent with the Bank's program for compliance with the Bank Secrecy Act; and
- (j) a program to ensure compliance with rules and regulations of the OFAC, including timely updating of lists from the OFAC.

(2) Within sixty (60) days of the date of this Order, the Board shall develop, implement, and thereafter ensure Bank adherence to a written program of policies and procedures to provide for the Bank's monitoring of suspicious cash, monetary instruments, wire transfers, and other activities for all types of transactions, accounts, customers, products, services, and geographic areas. The program shall be consistent with the standards set forth in the Manual, particularly in the sections discussing Suspicious Activity Reporting, Funds Transfers, and Purchase and Sale of Monetary Instruments. At a minimum, this written program shall establish:

- (a) reviews of cash purchases of monetary instruments;
- (b) periodic analysis of aggregate cash, monetary instrument, and wire activity;
- (c) periodic analysis of Currency Transaction Report filings;

- (d) automatic reviews of accounts or customers for which the Bank has received criminal subpoenas that may involve the Bank Secrecy Act;
- (e) reviews of transactions, accounts, customers, products, services, and geographic areas that pose greater than normal risk for compliance with the Bank Secrecy Act; and
- (f) submission of Suspicious Activity Reports (SARs) based on these reviews and analyses.

(3) Within sixty (60) days of the date of this Order, the Board shall develop, implement, and thereafter ensure Bank adherence to a written program of policies and procedures to provide for the application of appropriate thresholds for monitoring all types of transactions, accounts, customers, products, services, and geographic areas that pose greater than normal risk for compliance with the Bank Secrecy Act. At a minimum, this written program shall establish:

- (a) meaningful thresholds for filtering accounts and customers for further monitoring, review, and analyses;
- (b) an analysis of the filtering thresholds established by the Bank; and
- (c) periodic testing and monitoring of thresholds for their appropriateness to the Bank's customer base, products, services, and geographic area.

(4) Within sixty (60) days of the date of this Order, the Board shall develop, implement, document in writing, and thereafter ensure Bank maintenance of an integrated, accurate system for all Bank areas to produce periodic reports designed to identify unusual or suspicious activity, including patterns of activity, to monitor and evaluate unusual or suspicious activity, and to maintain accurate information needed to produce these reports.

- (a) The Bank's system shall be able to link related accounts, countries of origin, location of the customers' businesses and residences to evaluate patterns of activity;
- (b) The Bank shall maintain, either manually or through the Bank's electronic information systems, a list of all accounts associated with a relationship, a country or politically exposed person ("PEP");
- (c) The periodic reports shall cover one day, a number of days, and monthly reports and shall segregate transactions that pose a greater than normal risk for compliance with the Bank Secrecy Act;
- (d) The periodic reports shall include reports on all accounts posing greater than normal risk for compliance with the Bank Secrecy Act that are newly-established, renewed or modified, including the following information:
  - (i) the name of the customer;
  - (ii) the officers, directors and major shareholder of any corporate customer and the partners of any partnership customer;
  - (iii) any other accounts maintained by the customer and, as applicable, its officers, directors, major shareholders or partners;
  - (iv) a detailed analysis of the due diligence performed on the customer and, as applicable, its officers, directors, major shareholders or partners;
  - (v) any related accounts of the customer at the Bank;
  - (vi) any action the Bank has taken on the account;
  - (vii) the purpose and balance of the account; and

- (viii) any unusual activity for each account;
- (e) The periodic reports shall include reports on any type of subpoena received by the Bank and on any law enforcement inquiry directed to the Bank and any action taken by the Bank on the affected account; and
- (f) The periodic reports shall include reports deemed necessary or appropriate by the BSA Officer or the Bank.

(5) Within ninety (90) days of the date of this Order, the Board shall ensure that the BSA Officer or his/her designee conducts a review of each account that the Bank has internally designated (either as of the date of this Order or within 90 (ninety) days prior to the date of this Order) as posing greater than normal risk for compliance with the Bank Secrecy Act, and the related accounts of those customers. The review shall include the information listed in paragraph (4)(d) of this Article for each account and for the related accounts of those customers.

(6) The BSA Officer or his/her designee shall periodically review, not less than each calendar year, all account documentation for all accounts that pose greater than normal risk for compliance with the Bank Secrecy Act and the related accounts of those customers at the Bank to determine whether the account activity is consistent with the customer's business and the stated purpose of the account.

(7) The term "related accounts," as referenced in this Article, shall be broadly construed and shall include the following accounts:

- (a) all accounts for which there are common signatories, officers, directors, addresses, taxpayer identification numbers, or phone numbers that can be reasonably identified;

- (b) all accounts of a customer's immediate relatives by blood, marriage or adoption (e.g., spouses, children, parents, siblings, uncles, and aunts) that can be reasonably identified;
  - (c) all accounts of any corporation, joint enterprise, partnership or any undertaking whatsoever that can be reasonably identified as controlled by or operated substantially in the interest of any Bank customer; "control" includes direct or indirect ownership of ten percent (10%) or more of the stock, capital, or equity of any such undertaking; and "substantial interest" shall mean derivation in any manner of income of ten thousand dollars (\$10,000) or more per annum from the operation of any such undertaking; and
  - (d) all accounts where the Bank's customer can be reasonably identified as exercising control or authority over the account holder; and
  - (e) any account(s) so designated by the Assistant Deputy Comptroller.
- (8) Upon completion, the Bank shall provide copies of the written programs required by paragraphs (1), (2), (3), and (4) of this Article to the Assistant Deputy Comptroller.

### ARTICLE III

#### CUSTOMER IDENTIFICATION PROGRAM

- (1) Within sixty (60) days of the date of this Order, the Board shall review and amend the Bank's BSA program to ensure that it includes reasonable, risk-based procedures for the opening of new accounts that comply with the Bank Secrecy Act, including 31 C.F.R. § 103.121 (including procedures for collecting customers' identifying information, verifying customers'

identification, maintaining identification records, and determining whether customers appear on any list of suspected terrorists or terrorist organizations).

(2) Within sixty (60) days of the date of this Order, the Board shall develop and ensure Bank adherence to expanded account-opening procedures for all accounts that pose greater than normal risk for compliance with the Bank Secrecy Act by requiring:

- (a) identification of all account owners and beneficial owners in compliance with 31 C.F.R. § 103.121;
- (b) identification of the officers, directors, major shareholders or partners, as applicable;
- (c) documentation of the following information for all deposit account customers:
  - (i) any relevant financial information concerning the customer,
  - (ii) the type of business conducted by the customer;
  - (iii) the customer's source of income or wealth;
  - (iv) the stated purpose of the account and the nature of anticipated account activity; and
  - (v) any other due diligence required by this Order, the BSA Officer or the Bank.

(3) Before renewing or modifying an existing customer's account, the Bank shall confirm that it continues to have a reasonable belief as to the identity of the customer and, if the Bank does not still have such a reasonable belief, the Bank shall obtain the information required in the preceding paragraph (2) of this Article before renewing or modifying such existing customer's account.

(4) Within sixty (60) days of the date of this Order, the Bank shall develop and implement policies and procedures for addressing:

(a) Circumstances in which a customer seeking to open an account has applied for, but not received, a taxpayer identification number. Such policies and procedures shall be consistent with 31 C.F.R. § 103.121(b)(2)(i)(B); and

(b) Circumstances in which the Bank cannot form a reasonable belief that it knows the true identity of the customer. Such policies and procedures shall be consistent with 31 C.F.R. § 103.121(b)(iii).

(5) Upon completion of the policies and procedures developed under paragraphs (1), (2), and (4) of this Article, the Bank shall provide a copy of each to the Assistant Deputy Comptroller.

#### ARTICLE IV

##### SUSPICIOUS ACTIVITY REPORTS

(1) Within ninety (90) days, the Board shall develop, implement, and thereafter ensure Bank adherence to a written program to establish a system of internal controls and processes to ensure compliance with the requirements to file Suspicious Activity Reports set forth in 12 C.F.R. § 21.11, as amended. At a minimum, this written program shall establish procedures for identifying and reporting known or suspected violations of Federal law, violations of the Bank Secrecy Act, or suspicious transactions related to money laundering activity, including suspicious activity relating to the opening of new accounts, the monitoring of current accounts, and the transfer of funds through the Bank.

(2) Upon completion, the Bank shall submit a copy of this program to the Assistant Deputy Comptroller for review. In the event the Assistant Deputy Comptroller recommends changes to the program, the Board shall immediately incorporate those changes into the program.

## ARTICLE V

### BANK SECRECY ACT AUDIT

(1) Within sixty (60) days of the date of this Order, the Board, or a designated committee of the Board, shall adopt, implement, and thereafter ensure Bank adherence to an independent BSA audit program, including its scope, testing, and documentation, sufficient to:

- (a) determine the Bank's level of compliance with the BSA;
- (b) periodically test the adequacy of internal controls designed to ensure compliance with the Bank Secrecy Act in all areas of the Bank;
- (c) evaluate the Bank's adherence to established BSA policies and procedures;
- (d) perform an appropriate level of testing (including transactional testing) to support the BSA audit findings;
- (e) ensure adequate audit coverage in all areas, including accounts, products, services and LOB that pose greater than normal risk for compliance with the Bank Secrecy Act, and suspicious reporting requirements; and
- (f) establish an annual audit plan using a risk-based approach sufficient to achieve these objectives.

(2) Within sixty (60) days of the date of this Order, the Board shall ensure the Bank's BSA audit procedures include:

- (a) development of a schedule, from which deviations of more than 45 days will occur only with Board approval, for the Bank's BSA audits;
- (b) prompt management response and follow-up to all exceptions or other recommendations of any auditor for BSA matters or of the Office of the Comptroller of the Currency.

(3) All BSA audit reports shall be in writing and supported by adequate workpapers, which shall be provided to the Bank (and shall be made available to the OCC upon request). All reports prepared by the audit staff shall be filed directly with the Board and not through any intervening party, and the persons responsible for implementing the BSA audit program shall report directly to the Board, or to a designated committee of the Board, which shall have the sole power to direct their activities. The Board, or a designated committee of the Board, shall ensure that immediate action is taken to remedy deficiencies cited in BSA audit reports.

(4) Upon completion of the written BSA audit program required by paragraph (1) of this Article, the Bank shall provide a copy of the program to the Assistant Deputy Comptroller.

## ARTICLE VI

### BANK SECRECY ACT COMPLIANCE FUNCTION

(1) Within sixty (60) days of the date of this Order, the Board shall determine whether any changes are needed regarding the Bank's BSA Officer's supporting staff, including the responsibilities, authority, structure, independence, competencies, or capabilities of the BSA Officer's supporting staff. At a minimum, consideration shall consist of the following:

- (a) identification of the skills, expertise, and number of personnel needed to develop, implement, and maintain an effective Bank Secrecy Act compliance program;
- (b) identification of the skills, expertise, and number of the Bank's current staff; and
- (c) comparison of the current staff's skills and expertise identified in (1) (b) of this Article to the skills and expertise identified in (1)(a) of this Article as necessary to develop, implement, and maintain an effective Bank Secrecy Act compliance program.

(2) Within sixty (60) days of the development of a staffing assessment, the Board will implement and direct any changes necessary to provide the Bank with a staff that possesses the skills and expertise identified in paragraph (1)(a) of this Article. Thereafter the Board will ensure that the Bank adheres to the staffing plan.

(3) The Board shall review and revise the staffing plan on an annual basis, or more frequently if necessary, to ensure the Bank maintains a staff that possesses the skills, expertise, responsibilities, and duties consistent with the goals and objectives in the Bank Secrecy Act compliance program and with the Bank's Bank Secrecy Act risk profile.

## ARTICLE VII

### BANK SECRECY ACT TRAINING

(1) Within ninety (90) days of the date of this Order, the Board shall develop, implement, and thereafter ensure Bank adherence to a comprehensive ongoing training program for all appropriate operational and supervisory personnel to ensure their awareness of their

responsibility for compliance with the requirements of the Bank Secrecy Act, including the reporting requirements associated with SARs pursuant to 12 C.F.R. Part 21, Subpart B, regardless of the size of the relationship or type of customer involved.

(2) This comprehensive training program shall include strategies for mandatory attendance, the frequency of training, procedures and timing for updating training programs and materials, the method for delivering training, the appropriate training for employees in each LOB, and a process for familiarizing employees with the Bank's BSA compliance program (including the relevant policies and procedures implemented pursuant to this Order).

(3) Upon development of the training program required by paragraph (1) of this Article, the Bank shall provide a copy to the Assistant Deputy Comptroller.

## ARTICLE VIII

### VIOLATIONS OF LAW

(1) The Board shall immediately take all necessary steps to ensure that Bank management corrects each violation of law, rule or regulation cited in the Report of Examination for the most recent examination of the Bank's BSA compliance and in any subsequent Report of Examination. The quarterly progress reports required by Article I of this Order shall include the date and manner in which each correction has been effected during that reporting period.

(2) The Board shall ensure that the Bank has policies, personnel, and control systems to ensure implementation of and adherence to the programs and procedures developed pursuant to this Order.

## ARTICLE IX

### CLOSING

(1) Although the Board is by this Order required to submit certain proposed actions and programs to the Assistant Deputy Comptroller, the Board has the ultimate responsibility for proper and sound management of the Bank.

(2) It is expressly and clearly understood that if, at any time, the Comptroller deems it appropriate in fulfilling the responsibilities placed upon it by the several laws of the United States of America, to undertake any action affecting the Bank, nothing in this Order shall in any way inhibit, estop, bar or otherwise prevent the Comptroller from so doing.

(3) Any time limitations imposed by this Order shall begin to run from the effective date of this Order. Such time limitations may be extended in writing by the Assistant Deputy Comptroller for good cause upon written application by the Board.

(4) The provisions of this Order are effective upon issuance of this Order by the Comptroller, through his authorized representative whose hand appears below, and shall remain effective and enforceable, except to the extent that, and until such time as, any provisions of this Order shall have been amended, suspended, waived, or terminated in writing by the Comptroller.

(5) In each instance in this Order in which the Board is required to ensure adherence to, and undertake to perform certain obligations of the Bank, it is intended to mean that the Board shall:

- (a) authorize and adopt such actions on behalf of the Bank as may be necessary for the Bank to perform its obligations and undertakings under the terms of this Order;

- (b) require the timely reporting by Bank management of such actions directed by the Board to be taken under the terms of this Order;
- (c) follow-up on any non-compliance with such actions in a timely and appropriate manner; and
- (d) require corrective action be taken in a timely manner of any non-compliance with such actions.

(6) This Order is intended to be, and shall be construed to be, a final order issued pursuant to 12 U.S.C. § 1818(b), and expressly does not form, and may not be construed to form, a contract binding on the Comptroller or the United States.

(7) The terms of this Order, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreements or prior arrangements between the parties, whether oral or written.

IT IS SO ORDERED, this 19<sup>th</sup> day of January, 2006.

/S/  
\_\_\_\_\_  
Jeri Gilland  
Deputy Comptroller  
Southern District

**UNITED STATES OF AMERICA  
DEPARTMENT OF THE TREASURY  
COMPTROLLER OF THE CURRENCY**

In the Matter of: )  
The Summit National Bank )  
Atlanta, Georgia )

**STIPULATION AND CONSENT TO THE ISSUANCE  
OF A CONSENT ORDER**

The Comptroller of the Currency of the United States of America (“Comptroller”) is prepared to initiate cease and desist proceedings against The Summit National Bank, Atlanta, Georgia (“Bank”) pursuant to 12 U.S.C. § 1818(b), through issuance of a Notice for violations of 31 C.F.R. § 5318, 12 C.F.R. Part 21, and 31 C.F.R. Part 103.

The Bank, in the interest of compliance and cooperation, consents to the issuance of a Consent Order, dated 1-19-2006 (“Order”).

In consideration of the above premises, the Comptroller, through his authorized representative, and the Bank, through its duly elected and acting Board of Directors, hereby stipulate and agree to the following:

**ARTICLE I**

Jurisdiction

- (1) The Bank is a national banking association chartered and examined by the Comptroller pursuant to the National Bank Act of 1864, as amended, 12 U.S.C. § 1 et seq.
- (2) The Comptroller is “the appropriate Federal banking agency” regarding the Bank pursuant to 12 U.S.C. §§ 1813(q) and 1818(b).
- (3) The Bank is an “insured depository institution” within the meaning of 12 U.S.C. § 1818(b)(1).

- (4) As a result of this Order,
- (a) Pursuant to 12 C.F.R. § 5.3(g)(4), the Bank is not an eligible bank for the purposes of 12 C.F.R. part 5 unless otherwise informed in writing by the OCC.
  - (b) Pursuant to 12 C.F.R. § 5.51(c)(6)(ii), this Order shall not subject the Bank to the requirements of 12 C.F.R. § 5.51 unless otherwise informed in writing by the OCC.
  - (c) Pursuant to 12 C.F.R. § 359.1(f)(1)(ii)(C) and 12 C.F.R. § 5.51(c)(6)(ii), this Order shall not subject the Bank to the requirements of 12 C.F.R. part 359 unless otherwise informed in writing by the OCC.
  - (d) Pursuant to 12 C.F.R. § 24.2(e)(4), the Bank shall continue to be an eligible bank for the purposes of 12 C.F.R. part 24 unless otherwise informed in writing by the OCC.

## ARTICLE II

### Agreement

(1) The Bank, without admitting or denying any wrongdoing, hereby consents and agrees to the issuance of the Order by the Comptroller.

(2) The Bank further agrees that said Order shall be deemed an “order issued with the consent of the depository institution” as defined in 12 U.S.C. § 1818(h)(2), and consents and agrees that said Order shall become effective upon its issuance and shall be fully enforceable by the Comptroller under the provisions of 12 U.S.C. § 1818(i). Notwithstanding the absence of mutuality of obligation, or of consideration, or of a contract, the Comptroller may enforce any of

the commitments or obligations herein undertaken by the Bank under his supervisory powers, including 12 U.S.C. § 1818(i), and not as a matter of contract law. The Bank expressly acknowledges that neither the Bank nor the Comptroller has any intention to enter into a contract.

(3) The Bank also expressly acknowledges that no officer or employee of the Comptroller has statutory or other authority to bind the United States, the U.S. Treasury Department, the Comptroller, or any other federal bank regulatory agency or entity, or any officer or employee of any of those entities to a contract affecting the Comptroller's exercise of his supervisory responsibilities.

### ARTICLE III

#### Waivers

- (1) The Bank, by signing this Stipulation and Consent, hereby waives:
- (a) any and all. procedural rights available in connection with the issuance of the Order;
  - (b) all rights to seek any type of administrative or judicial review of the Order; and
  - (c) any and all rights to challenge or contest the validity of the Order.

### ARTICLE IV

#### Other Action

(1) The Bank agrees that the provisions of this Stipulation and Consent shall not inhibit, estop, bar, or otherwise prevent the Comptroller from taking any other action affecting the

Bank if, at any time, it deems it appropriate to do so to fulfill the responsibilities placed upon it by the several laws of the United States of America.

IN TESTIMONY WHEREOF, the undersigned, authorized by the Comptroller as his representative, has hereunto set his hand on behalf of the Comptroller.

/S/ \_\_\_\_\_  
Jeri Gilland  
Deputy Comptroller  
Southern District

January 19, 2006  
Date

IN TESTIMONY WHEREOF, the undersigned, as the duly elected and acting Board of Directors of the Bank, have hereunto set their hands on behalf of the Bank.

S/ \_\_\_\_\_ January 17, 2006  
Gerald (Jerry) Allison Date

S/ \_\_\_\_\_ January 17, 2006  
Pin Pin Chau Date

S/ \_\_\_\_\_ January 17, 2006  
Jack Halpern Date

S/ \_\_\_\_\_ January 17, 2006  
Jose Gonzales Date

S/ \_\_\_\_\_ January 17, 2006  
Shafik Ladha Date

S/ \_\_\_\_\_ January 17, 2006  
Francis Lai Date

S/ \_\_\_\_\_ January 17, 2006  
James Lai Date

S/ \_\_\_\_\_ January 17, 2006  
Carl Patrick Date

S/ \_\_\_\_\_ January 17, 2006  
W. Clayton Sparrow, Jr. Date

S/ \_\_\_\_\_ January 17, 2006  
David Yu Date